PROCEDURES MANUAL

Utah Program Improvement Planning System (UPIPS)

A Special Education Continuous Improvement Monitoring System

I. Foreword

The Utah State Office of Education, Special Education Services (USOE-SES) has the responsibility of monitoring compliance with federal and state requirements under the Individuals with Disabilities Education Act of 2004 (IDEA). This responsibility is administered within the framework of supporting positive results for students with disabilities.

USOE-SES's continuous improvement monitoring system reflects the federal intent to emphasize a data-driven, systemic approach to compliance and improvement of results for children with disabilities. Previous UPIPS implementation has been generally effective in assisting LEAs in maintaining procedural compliance with federal and state regulations, but has also resulted in increased LEA commitment to the monitoring process, as well as more involvement in implementing corrective action plans and ownership in results.

The 2007 revision of UPIPS provides for a focus on LEA performance on USOE Annual Performance Report (APR) indicators, as well as additional levels of SEA support for LEAs with continuing uncorrected compliance issues during previous UPIPS cycles, creating a process that is differentiated by results.   This differentiation will include the level of monitoring by the SEA, according to the LEA's performance in a variety of pre-identified areas and indicators. Methods and procedures used to implement the Utah Program Improvement Planning System are consistent, but flexible, in order to adapt to the individual needs of students, educational settings, and administrative realities.

While continuing the monitoring of IDEA compliance, renewed focus is on the systematic evaluation of the impact of special education services on student achievement. Thus, this model has shifted from the previous emphasis of episodic procedural monitoring to one of active strategic planning and continuous improvement within the framework of compliance.

II. Purpose

Objectives of the Continuous Improvement Monitoring System

The monitoring system has five major objectives:

- Ensure a meaningful and continuous process that focuses on improving academic and social outcomes for students with disabilities by linking APR data to improvement efforts.

- Ensure compliance with IDEA federal regulations and Utah State Board of Education Special Education Rules.
- Connect LEA-level and school-level improvement efforts with IDEA requirements.

- Support each school district and charter school in the process of self-assessment, evaluation, and improvement of compliance and program effectiveness.

- Link program improvement activities with professional development planning.

Monitoring Process Themes

The overall system is based on the following underlying principles or themes.

- **Continuity.** An effective accountability system is continuous rather than episodic, linked to systemic change, and integrates self-assessment with continuous feedback and response.

- **Partnership with stakeholders.** The LEA works in partnership with diverse stakeholders. This collaboration impacts the following areas: the collection and analysis of self-assessment data, the identification of critical issues and solutions to problems, and the development, implementation, and oversight of improvement strategies to ensure compliance and improved results for students with disabilities.

- **LEA accountability.** LEAs are accountable for identifying strengths and areas of concern based upon data analysis; identifying, implementing and revising strategies for program improvement, and annual measurement and progress reports.

- **Self-assessment.** Each LEA works with stakeholders to design and implement a self-assessment process that focuses on improving results for students with disabilities.

- **Data-driven process.** The improvement process in each LEA is driven by data that focuses on improved results for students with disabilities. Each LEA collects and uses data on an ongoing basis, aligned with both the SEA's and the LEA's performance goals and indicators. Data that are available and can be critical to the self-assessment process include: personnel needs, graduation and drop-out

rates, performance of students with disabilities on state- and district-wide assessments, rates at which children with disabilities are suspended and/or expelled from school, and rates of identification and placement of students from minority backgrounds.

- **Technical assistance.** Because the focus of the monitoring process is on continuous improvement, technical assistance is a critical component of the process. Key components of technical assistance are the identification and dissemination of promising practices and professional development. LEAs are encouraged to include these components as part of their improvement plan.

Utah's Program Improvement Planning System (UPIPS)

Utah's continuous improvement monitoring system is called UPIPS. The system is based on the Office of Special Education Programs (OSEP) delineation of important program areas for special education in SEAs and LEAs. Each program area has goals specified as desired results for students with disabilities.

- o I. General Supervision
  - **Goal 1--Free Appropriate Public Education is available to all children in the LEA because the SEA and LEA monitoring system and other mechanisms for ensuring compliance, and parent and child protections are systematic and utilize data to develop Corrective Action Plans and activities (APR Indicators 15-20).**
  - **Goal 2--All members of the IEP team have timely access to professional development and support activities that facilitate improved educational results for students with disabilities and the implementation of IDEA.**
  - **Goal 3--The needs of students with disabilities are determined based upon state definitions, eligibility criteria and appropriate evaluation procedures (APR Indicator 11).**

- o II. Parent Involvement
  - **Goal 4--Parents and eligible youth with disabilities are aware of and have access to their rights and responsibilities within the system for parent and child protections.**
  - **Goal 5--Programs and services for students with disabilities improve because parents are actively involved in program improvement activities (APR Indicator 8).**

- o III. Free Appropriate Public Education in the Least Restrictive Environment
  - **Goal 6--All students with disabilities receive a free appropriate public education in the least restrictive environment that promotes a high quality education and prepares them for post-school employment and independent living (APR Indicators 1-2, 5-7).**

- **Goal 7--Students with disabilities are making continuous progress within the SEA and LEA system for educational accountability (U-PASS) (APR Indicator 3).**

- IV. Transitions
    - **Goal 8--Children exiting Part C have an IEP developed and implemented by their third birthday, when appropriate (APR Indicator 12).**
    - **Goal 9--All students with disabilities, beginning at age 16, or earlier if appropriate, receive individualized, coordinated transition services, designed within an outcome-oriented process that promotes movement from school to post-school activities (APR Indicators 13-14).**

III. Utah's Continuous Improvement Monitoring Process

The Utah Special Education Program Improvement Planning System (UPIPS) operates on a five-year cycle that is based on the concept that monitoring is an ongoing process. A select group of LEAs will enter into Round 2--Year 1 each calendar year.   Activities for each year will be determined based upon LEA and SEA data needs.

IV. Overview of 5 Year Cycle

School districts are assigned to a cohort based on location and size. Charter schools are assigned to UPIPS during their second year of operation with students. The balance of the number and size of school districts in each year of the cycle is determined so that the resources of the USOE can meet the needs of the required activities.

Schedule: All LEAs Entering Year 1 of UPIPS Cycle

2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008
Public School Districts					
Cache	Emery	Daggett	Alpine	Carbon	Cache
Jordan	Granite	Davis	Beaver	Grand	Jordan
Park City	Juab	Duchesne	Box Elder	Kane	Park City
Piute	Logan	Iron	Garfield	Ogden	Piute
Tintic	Murray	Millard	San Juan	Provo	Tintic
Tooele	Nebo	Morgan	Sevier	Salt Lake	Tooele
Wasatch	N. Sanpete	Rich	S. Summit	USDB/JMS	Wasatch
Washington	N. Summit	S. Sanpete	Uintah	Weber	Washington
	Wayne				
Public Charter Schools					
Itineris Early College High School	City Academy	Freedom Academy	AMES	American Leadership Ac.	Channing Hall
Park City Learning Center	Pinnacle Canyon	John Hancock	American Prep. Ac.	BSTA	Early College HS
		CBA	DaVinci	Lincoln Ac.	Entheos Ac.
		Thomas Edison North	E. Hollywood	Moab Comm.	George Washington Ac.
		Timpanogos Academy	Fast Forward	Navigator Pointe Ac.	Itineris
		Tuacahn High School for the Performing Arts	N. Davis Prep.	North Star Ac.	Lakeview Ac.
		Walden	NUAMES	Odyssey	Legacy Prep. Ac.
			Ogden Prep.	Reagan Ac.	Liberty Ac.
			Salt Lake Arts Ac.	Success Ac.	Monticello Ac.
			Soldier Hollow	Thomas Edison South	Mountainville Ac.

			Summit Ac.	UCAS	Noah Webster Ac.
			Ranches	Wasatch Peak Ac.	Paradigm HS
			Uintah River		Park City Learning Center
					Renaissance Ac.
					SL School for the Performing Arts
					Spectrum Ac.
					Syracuse Arts Ac.

V. Participants and Roles

UPIPS Management Team
      The UPIPS Management Team consists of the USOE Technical Assistant (TA), the USOE Monitoring Specialist, USOE support staff, USOE State and Federal Compliance Officer, and the State Director of Special Education. The Management Team is responsible for the overall operation of the UPIPS activities. Periodic meetings, at least twice a year, are held to discuss the current status of the process, results, and needed adjustments.

USOE Monitoring Specialist

> **JOBS FOR EACH PARTICIPANT**

- Review Self Assessment Report with TA
- Conduct scheduling conference with LEA director
- Set up on site visits
- Communicate with LEAs about visits
- Attend visits for technical support and file reviews
- Run Orientation and Exit Meeting during on site validation visit
- Facilitate team activities
- Draft and finalize reports
- Track progress of each LEA
- Prompt TAs to remind LEAs of items due
- Prompt secretary to draft form letters
- Review all communication with LEAs, including letters, reports, tracking reports/logs, schedules
- Communicate frequently with TAs

USOE Technical Assistant (assigned to particular districts and charter schools)

- Attend annual UPIPS training
- Review assigned LEA data profiles
- Prompt LEA about required documents during all years of cycle
- Contact UPIPS Team Leader if documents overdue
- Participate in on site validation visit
- Validate completion of CAPs
- Arrange verification of results of CAPs and PIP with LEA director

UPIPS Support Staff

- Gather USOE off site data
- Put all letters on letterhead as requested, obtain signatures and mail copies as appropriate
- Ensure that all recipients receive copies of documents as needed
- Make travel arrangements for on site validation visit
- Prepare all materials for on site validation visit

- Collect parent information from selected LEAs and mail surveys
- Compile interview and survey data, send to UPIPS Team Leader
- Maintain UPIPS log of current status of documents
- Prepare and maintain records storage systems for UPIPS
- Ensure confidentiality of identifiable student information

On-site Validation Team

Each validation visiting team is made up of the following members: Validation team members: USOE LEA TA, Utah Parent Center Representative, USOE Monitoring Specialist, and contracted reviewers as needed.

LEA Stakeholder Steering Committees
- Gain understanding of purpose and function of UPIPS process
- Decide how to collect desired data
- Assign data collection sections to sub-committees
- Analyze data and implications of findings
- Determine areas of strength, areas of needed program improvement, and areas of non-compliance, if any

LEA Special Education Directors and Coordinators

- Submit off site data
- Form Stakeholder Steering Committee for UPIPS process
- Assign sub-committees to collect and analyze data
- Meet with Stakeholder Steering committee to review data and identify areas of strength, areas of non-compliance, and areas for needed improvement
- Write and submit Self Assessment Report and Executive Summary, containing CAPs and PIP
- Schedule on site validation visit
- Provide space and inform schools about visit activities
- Submit additional CAPs based on UPIPS report from USOE
- Implement corrective actions and submit evidence of completion
- Report annually on progress on program improvement goals.
- Participate in focused monitoring of results of corrective actions.

Stakeholder Advisory Groups: USEAP, LEAD Leadership Team, USOE UPIPS Steering Committee

Feedback regarding the UPIPS process is sought from stakeholders regularly. At least annually a report is presented to the Utah Special Education Advisory Panel summarizing the findings of the UPIPS process in the LEAs participating in on site validation visits. Comments about the process are also gathered from the Local Education Agency Directors (LEAD) Leadership Team. The LEAD Leadership Team raises concerns from special education directors all over the state and these are addressed in upcoming LEAD membership meetings. A USOE UPIPS Steering Committee was also formed in June, 2006, and consists of representation from school districts, charter schools, and parents, to provide further opportunities for feedback and input into the UPIPS process.

VI. Procedures

For LEAs in Year 1 of UPIPS

USOE Responsibilities	• Select and notify LEAs for participation. • Provide training for LEAs entering first year of UPIPS cycle. • Send a letter of explanation to District Superintendent or Charter School Director/Principal. • Prepare an LEA Data Profile that includes a summary of previous CAPs and submitted results. • Budget and assign fiscal support for each LEA to complete self assessment activities. (The amount of fiscal support is calculated on a base amount of $1,500 and additional amount of $.20 per child based on total LEA enrollment.) • Collect and analyze off-site data from each LEA. • Provide materials for training the Stakeholder Steering Committee on its role in the process. • Present interview outlines and a Goals and Performance Indicators summary sheet. • Provide a format and example of the Program Improvement Plan and Corrective Action Plan for non-compliance items. • Offer file review software and a hard copy file review checklist.

LEA Responsibilities	- Collect and analyze off-site data, relating it to the five program areas. - Coordinate with SEA to determine need for mandatory CSPD activities based on LEA profile and compliance history, and establish training schedule (if appropriate). - Submit required off-site data to USOE by December 1. - Reconvene the Stakeholder Steering Committee and develop agendas for meetings. - Set dates for Stakeholder Steering Committee meetings. - Establish timelines for the Self-Assessment process. - Allocate resources for Self-Assessment and Program Improvement Planning. - Conduct the training meeting of the Stakeholder Steering Committee. - Review LEA Data Profile provided by USOE and collect additional data, as needed. - Facilitate review of program areas, goals, and performance indicators. - Establish sub-committees and define assignments for collection and analysis of data from various sources. - Determine the process and dates for file review, interviews, and other data collection. - Facilitate subsequent meetings to review and analyze data and findings. - Compile and analyze student outcome data, including LRE, disproportionality, highly qualified staff, academic achievement, graduation and drop out rates, suspension and expulsion rates, LRBI, classification, prevalence, and other sources. - Notify schools and staff who have been selected for file review and interviews. - Send out surveys, conduct file reviews, and hold interviews and focus groups, summarizing resulting data. - Facilitate the analysis and compilation of collected data, relating it to the five program areas. - Present findings and analysis to Stakeholder Steering Committee for review. - Provide leadership to the Stakeholder Steering Committee in establishing Program Improvement Goals that address issues identified in the data sources listed above. - Report any areas of non-compliance and suggest corrective actions.

LEA Responsibilities	• Prepare the Self-Assessment Report including all required elements:
	   ○ LEA profile.
	   ○ Description of the purpose and process of the Self-Assessment.
	   ○ Explanation of stakeholder involvement including membership and activities of the Steering Committee.
	   ○ Summary of all data collected during the Self-Assessment process.
	   ○ Results of the Self-Assessment data analysis related to the ten goals in the five Program Areas.
	   ○ Evidence of mandatory CSPD, including attendance and agendas, as well as evidence of follow-up requirements.
	   ○ List of strengths or exemplary practices of the special education program.
	   ○ List of areas of non-compliance.
	   ○ List of areas of recommendations for program improvement of the special education program.
	   ○ An Executive Summary.
	   ○ A Special Education Program Improvement Plan (PIP).
	   ○ A Corrective Action Plan (CAP) for areas of non-compliance.
	• Submit required state and federal data reports and LEA application.
	• The Self-Assessment Report to the USOE-SES Technical Assistant. The reimbursement request for UPIPS fiscal support to the State Director of Special Education.

When each LEA's Self Assessment Report is received at the USOE, the TA and the UPIPS Coordinator review the report and discussion takes place as to how well it meets the requirements and the criteria sets in the UPIPS Manual. If the LEA's Stakeholder Steering Committee has conducted a thorough self assessment that meets all criteria, the review may be scheduled from one to four days in length, depending upon the size and needs of the LEA. If the self assessment does not include complete and adequate data, a more extensive on site validation visit may be conducted.

For LEAs in Year 2 of UPIPS

USOE Responsibilities	• Identify schools, teachers, and types of files for review. • Collaborate with LEA in setting up schedule and details of on-site validation visit. • Conduct the on-site visit to the LEA in order to validate the self-assessment findings and Program Improvement Plan goals. • Submit a UPIPS Final Report of validation visit findings to the LEA, including strengths, areas of systemic noncompliance, individual file reports, and recommendations for program improvement. • Share UPIPS final report with the public.
LEA Responsibilities	• Initiate implementation of the LEA's Program Improvement Plan. • Carry out Corrective Action Plan contained in Self-Assessment Report. • USOE-SES staff is available to assist the director as necessary. • Collaborate with USOE-SES staff in setting up the on-site validation visit. • Provide required information to monitoring specialist. • Inform staff of schedule and requirements during on-site visit. • Share final UPIPS report with local School Board and Public. • Submit evidence of sharing with public to SEA. • Revise the Special Education Program Improvement Plan, as appropriate, to reflect additional findings after the SEA site visit and report. • Submit Corrective Action Plans for any additional areas of non-compliance from the USOE UPIPS Final Report. • Plan CSPD activities to facilitate PIP and CAP. • Begin file correction activities for individual file errors identified through SEA on-site visit. • Continue to implement the Program Improvement Plan and Corrective Action Plan with revisions based on UPIPS Report. • Submit required state and federal data reports and LEA application. • Begin individual file error correction procedures.

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Preparing for the On Site Validation Visit

      USOE selects schools from each year 2 LEA by using a stratified quasi-random drawing procedure. Representation of schools from preschool, elementary, middle/junior high, and high school are selected. In addition, if the LEA has special schools, such as an alternative school or a centralized site for students with the most severe disabilities, a representative number of those schools are also selected.

      Next the LEA sends a list of the teachers in those schools, their assignments, and the full time equivalent they work. Depending on the number of teachers at the site, names are drawn for file review and interview. If there are only one or two teachers, all are picked. Attention is

paid to gaining a balance of "resource" teachers and those who teach in self-contained classrooms. If LEA cluster units are located at the school, one or more of those teachers is also selected. The schedule is designed with geographical location and travel time minimized for the review teams.

The Validation Visit Schedule

ORIENTING LEA STAKEHOLDER STEERING COMMITTEE TO PROCESS AND VALIDATION TEAM MEMBERS TO LEA

The schedule typically begins with an orientation meeting for the LEA UPIPS stakeholder steering committee and the review team, and ends with an exit meeting of the review team and the stakeholder steering Committee or staff, as the LEA chooses. At the Orientation meeting an overview of the UPIPS 5-year cycle and on-site visit activities is presented by the UPIPS Team Leader. The Stakeholder Steering Committee or LEA Specail Education Director is encouraged to mention any strengths or areas of concern from the Self Assessment Report that the team should pay attention to during the school visits. A parent focus group is also scheduled in the late afternoon or evening, often on the first day of the visit. The teachers' names are entered in the schedule. A sample of related service providers, including speech and language pathologists, evaluators/psychologists, occupation and physical therapists, and others is selected.

Organization of the Validation Team

The UPIPS Team Leader then assigns the teams to the schools. Usually there are at least two reviewers on each team, so that one can conduct interviews while the other performs student record reviews. Interviews are conducted with principals, special education teachers and other case managers such as SLPs, and general education teachers in the schools.

File reviews are performed according to a sliding scale based upon the size of the LEA. The USOE team review of student records enables the state to validate the systemic compliance problems the LEA reported from their self assessment, and to identify others if there are any.

On Site Visit Procedures at the Schools

As the UPIPS Validation team arrive at the schools, they introduce themselves to the principal and the special education team. Each teacher or other case manager who has been selected provides a list of their caseload with disability codes, IEP dates, and re-evaluation dates. The file reviewer selects at least two files from each teacher's current

STUDENT RECORD REVIEW PROCESS

caseload list. Student record reviewers are instructed to choose a variety of disability codes and levels of service, students who may be English language learners, students recently identified and those who have had eligibility longer, and different grade levels. In each LEA, a sample of "special files" are asked for prior to the visit. These special files include:

- o A written notice of refusal to take an action
- o Record of a disciplinary action considered or implemented
- o A Functional Behavior Assessment and Behavior Intervention Plan
- o An addendum or notation of ESY services selected
- o Student whose primary home language is documented as other than English
- o Student evaluated but not eligible

- o LRBI level 3 or 4 interventions
- o Student in state custody/special education student
- o Youth in custody/special education student
- o Student with surrogate parent at IEP meeting
- o Student with an Orientation and Mobility assessment

The reviewer initials next to each student's name whose file is examined and brings the list back to the UPIPS Team Leader.

Teachers or other case managers are invited to sit with the reviewer as their files are examined. This provides an excellent training opportunity, removes any question as to why some items are marked out of compliance, and helps the reviewer locate needed documents in the file more quickly. The LEA or school may choose to take advantage of this option or not. The file reviewer proceeds to review at least two files from each case manager selected at the school and enters the data on the student record review program on the laptop computer.

Meanwhile, the interviewer arranges to meet with each of the case managers selected, the principal, and at least one general education teacher who has a special education student in class Each interview is conducted using an interview form specifically designed for each role. The interview questions and prompts assess the level of knowledge of the stakeholder about the special education process and requirements. Other questions address the quality of the program in the school and LEA. In the middle, junior high, and high schools, a student focus group is also conducted. The special education teachers are asked to select approximately 3-6 students with disabilities for the focus group.

| CONDUCTING the INTERVIEWS |

When the reviewers have two case managers to work with, a typical school visit lasts about half a day. At larger schools, especially high schools, the visit may last the whole school day.

Validation Team Activities

During the visit, the review team holds at least one team meeting, scheduled by the UPIPS Team Leader. Usually there is a meeting early in the morning at the beginning of the visit, prior to the orientation meeting with the LEA. The final schedule and the executive summary of the LEA's self assessment report are distributed to team members. Assignments are reviewed and transportation arrangements finalized. This meeting also provides an opportunity for the UPIPS Team Leader to review procedures as needed, and to address any concerns identified during previous validation visits. Another meeting may be held on the second day of the visit at the UPIPS Specialists discretion.

On the last day of the visit, the validation review team members come together for a consensus meeting. Each team member completes a form that prompts them for their observations on various parts of the IEP process and compliance items, as well as overall impressions of the schools and LEA. The UPIPS Team Leader discusses these points with the team and puts it all together in a verbal report for the exit meeting. This consensus meeting usually takes about one hour.

Completing the Validation Visit

Next, the UPIPS Team Leader meets with the LEA director and the LEA superintendent to discuss any concerns that might be personally identifiable, and thus be inappropriate to share

with the entire stakeholder steering committee during the exit meeting. At the end of the visit, an exit meeting with the stakeholder steering committee and staff is conducted. The UPIPS Team Leader gives a brief oral summary of the findings from the visit. The findings are reported in each of the five program areas, with strengths and areas of concern expressed. At the end of this report, validation team members and LEA team members are invited to make any additional comments or ask questions they may have.

Preparing the Validation Visit Report

The UPIPS Team Leader drafts the report within 90 days of the validation visit. The report identifies areas of strength identified by the self assessment report that are validated by the review team, as well as other strengths of the LEA special education program noted by the review team. It also identifies areas of non-compliance validated from the self -assessment, along with additional compliance issues, if any. Finally, recommendations from the validation visit are presented for the steering committee's consideration. LEAs are required to submit corrective action plans for any additional non-compliance items in the report within 90 days of receipt of the report.

For LEAs in Year 3

USOE Responsibilities	• Be available for technical assistance. • Review evidence of file error correction. • Review Corrective Action Plan implementation results. • Review annual progress reports on Program Improvement Plan. • Conduct follow-up on-site visits if verification of results data are not submitted.
LEA Responsibilities	• Continue to implement its Program Improvement Plan. • Continue to implement Corrective Action Plan activities. • Implement planned CSPD activities. • Collect and review data to measure the effectiveness of the action steps for each Program Improvement goal. • Revise the Program Improvement Plan based on continuous self-assessment. • Submit evidence to verify results of Corrective Action Plan implementation. • Complete correction of individual file errors identified through SEA on-site visit. • Submit evidence of individual file error correction to the USOE. • Submit annual progress reports on Program Improvement Plan to the USOE. • Submit required state and federal data reports and LEA application.

For LEAs in Year 4

USOE **Responsibilities**	• Identify files and type of review based on LEA submitted Corrective Action Plan results. • Collaborate with LEA in setting up schedule and details of on-site focused visit. • Conduct the on-site focused visit to the LEA in order to validate the Corrective Action Plan goals and results. • Ensure that required Corrective Action Plans are submitted by the LEA. • Submit a UPIPS Final Report of on-site focused visit findings to the LEA. • Be available for technical assistance. • Review evidence of file error correction. • Review revised Corrective Action Plan. • Review revised Program Improvement Plan. • Review annual progress reports on Corrective Action Plan and Program Improvement Plan. •

LEA Responsibilities	• Continue to implement its Program Improvement Plan.
	• Continue to implement Corrective Action Plan activities, as appropriate.
	• Collect and review data to measure the effectiveness of the action steps for each goal.
	• USOE-SES staff is available to assist the director as necessary.
	• Collaborate with USOE-SES staff in setting up the on-site focused visit.
	• Provide required information to monitoring specialist.
	• Inform staff (if needed) of schedule and requirements during on-site visit.
	• Share final UPIPS report with local School Board and Public.
	• Submit method of sharing with public to SEA.
	• Revise Special Education Program Improvement Plan, as appropriate; to reflect additional findings after the SEA on-site focused visit and report.
	• Revise the Corrective Action Plan, as appropriate; to reflect additional findings after the SEA on-site focused visit and report.
	• Plan/continue to implement CSPD activities to facilitate PIP and CAP.
	• Begin file correction activities for individual file errors identified through SEA on-site focused visit.
	• Continue to implement Program Improvement Plan and Corrective Action Plan with revisions based on UPIPS Report.
	• Submit annual progress reports on Corrective Action Plan and Program Improvement Plan to the USOE.
	• Submit required state and federal data reports and LEA application.
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For LEAs in Year 5

USOE Responsibilities	• Be available for technical assistance. • Review evidence of file error correction. • Review annual progress reports on Corrective Action Plan and Program Improvement Plan.
LEA Responsibilities	• Continue to implement its Program Improvement Plan. • Complete Corrective Action Plan activities. • Collect and review data to measure the effectiveness of the action steps for each goal. • Coordinate with SEA to determine possible need for mandatory CSPD activities based on LEA profile and compliance history, and establish training schedule. • Revise the Program Improvement Plan based on continuous self-assessment. • Complete corrections of individual file errors identified through SEA on-site focused visit. • Submit evidence of individual file error correction to the USOE. • Submit annual progress reports on Corrective Action Plan and Program Improvement Plan to the USOE. • Submit required state and federal data reports and LEA application.

VII. Working with Data

Data Collection Model

The data collection and aggregation model requires the triangulation of data from a variety of sources. Data sources include:
- Off site data from LEA and USOE,
- Data on identification of students in various disability categories,
- LRE and services location data,
- Performance in state wide assessment programs,
- Ethnicity
- Prevalence,
- Suspension and expulsion data,
- Interview and file review data from LEA self assessment,
- Interview and file review data from on site validation visit,
- Parent focus groups,
- Parent mail surveys,
- Student focus groups,
- Administrative interview data,
- Personnel data from USOE CACTUS system,
- Caseload data from case manager lists, and
- Complaints and due process hearing requests.

In the Validation Visit Report, all of the data sources are used and integrated to identify findings. Non-compliance items usually have at least two lines of evidence to confirm them as findings. Student record non-compliance items are identified as systemic when they reach a certain level across all the files reviewed.

Systemic Compliance Findings Sliding Scale
For 20 or more records, threshold is 20% or greater
For 13-19 records, threshold is 30% or greater
For 7-12 records, threshold is 40% or greater
For 3-6 records, threshold is 50%or greater
No systemic findings for fewer than three records

Data from UPIPS sources is also used for analysis for other purposes, such as the SEA State Performance Plan, the SEA Self Assessment process, identification of CSPD needs, and reporting to stakeholder groups. A UPIPS log is maintained tracking the progress of each LEA on all required data and documentation submitted.

VIII. Training Activities

Regular training activities are conducted by USOE for various groups of UPIPS participants and stakeholders. This instruction is provided to ensure that all players understand the legal foundation for monitoring, the stages of the UPIPS process, federal regulations and state rules regarding documentation of procedural safeguards, and various roles in the procedures.

LEAs

Each June-August a training session for LEAs entering Year 1 of the UPIPS cycle is held. The special education directors are invited to attend and bring other key people from the LEA who will be assisting with the self assessment process. The training includes a thorough review of the components of each year as described in the UPIPS Manual. Each participant is provided with a copy of the manual.

In-depth training for LEAs on the student record review software is available. LEAs may contact the UPIPS Team Leader or TA to schedule such training activities. Trainers are selected and the session is conducted in the LEA. Additional training and support on the overall UPIPS process, as well as training on rules and regulations, is also available to LEAs upon request of the special education director.

Staff USOE

The specialists who are TAs to LEAs and the State Director receive information about the monitoring process in several ways. First, all the USOE staff, and the UPDC staff, are invited and encouraged to attend the annual UPIPS training sessions with the LEA personnel. Second, approximately once per month at staff meetings particular aspects of the UPIPS process are reviewed to enable TAs to complete their responsibilities for their LEAs. Finally, individual support and review is provided to TAs by the UPIPS Team Leader upon request and when prompting TAs to assist assigned LEAs.

Validation Visit Team

All members of the validation visit team are required to attend an annual training, in June-August, prior to the first on site validation visit of the school year. This training includes review and updates on the student record review program, and practice to build fluency in using the software. Each year the team members also participate in role playing practice on conduction and scoring the interviews with various stakeholders. Any changes in the procedures for the on site visits are also explained.

Confidentiality and roles of team members are reviewed in detail. At this time, the UPIPS support staff is also able verify contact and availability information and make any needed changes.

IX. Tools

Many helpful tools to facilitate the UPIPS process for LEAs and the SEA have been developed. These tools help to collect, analyze, and track information about special education programs in LEAs and the state as a whole.

Interview Formats. Specific interview formats have been developed for each of the roles of those included in the interview process. These forms increase the reliability of the data collected by various validation team members. Frequent correct responses to each are included to enhance the consistency of the ratings. The topics included in the interviews are provided to LEAs with similar questions as part of the UPIPS Manual. LEAs may choose to use these in conducting the self assessment, or modify them as they see fit.

Interview data aggregation. A program that aggregates the data for persons interviewed in various roles is used by the UPIPS support staff. The program produces a record of each person interviewed, a summary of response of each role, and an overall summary by indicators.

Punch lists. Punch lists for the USOE TA, UPIPS support staff, and UPIPS Team Leader provides a blue print and a prompt to ensure that each required activity takes place. A technology-based prompting system will supplement the punch lists soon.

SRR Software. Under a GSEG grant from OSEP, the USOE contracted to have student record review software developed by persons at the Utah State University. The software includes each item to be documented in the student file. It also has links to the relevant section of the state rules and federal regulations for IDEA 2004, and interpretations that have been made by the USOE compliance officer. These tools have increased the reliability of the data collected by the file reviewers in each LEA.

A few LEAs have chosen to utilize this software to conduct their own internal file reviews as part of their self assessment process. The program and training on it is available to all LEAs at no cost. Versions of the program are available for both the MAC and PC platforms.

File errors report software. Report software has also been developed and incorporated into the SRR program. The reports identify systemic errors in the LEA and can also be produced to show information by school. Improvements in the reporting program now allow users to run multiple reports instantly.

UPIPS Manual for LEAs. A UPIPS Manual is produced, with updates yearly, and provided to LEAs entering year 1 each year. The Manual contains formats for all required reports, interview content suggestions, training materials for the Steering Committee, data reports for the specific LEA, and other resources to facilitate the LEA's participation in each year's activities. The current manual is also available for download on the USOE website.

X. Public Posting of Results

Each LEA is required to share the results of the self assessment and the on site validation visit report with the public. Most LEAs choose to do this in a regularly scheduled board meeting. LEAs must provide the UPIPS Team Leader with documentation of public sharing of the UPIPS report within 90 days of receiving the formal report. Patrons may be provided a copy of the report upon request. The LEA may charge for the cost of producing the report.

The USOE Special Education Department annually posts all UPIPS Executive Summaries of on site visits for the previous school year on the USOE web site. Complete reports will be available by email to those who express interest.

XI. Sanctions and Interventions

The issue of sanctions and interventions to improve compliance with IDEA is considered in three ways: proactive activities, interventions to improve identified problems, and sanctions to ensure compliance.

Proactive activities. The Utah State Office of Education is continually making efforts to improve the alignment of CSPD with aggregated UPIPS finding state wide. Presentations on common areas of non-compliance and program improvement are available on the USOE website. These will ensure more consistent understanding and implementation of certain IDEA requirements. The tools, such as the UPIPS Manual and student record review software are also preventive measures that LEAs may use to ensure compliance. Development and use of a computerized tracking system to track LEA systemic noncompliance will ensure the delivery of consistent prompts, by email, telephone, and in writing regarding requirements is designed to enable LEAs to meet timelines appropriately.

> **PREVENTIVE MEASURES**

Interventions to improve problems. Training on any identified concerns and non-compliance finding is always available for the USOE and the UPDC. For those LEAs with continuing systemic after completing UPIPS Round 1, special education training must be delivered by staff from the USOE or the UPDC.

.   **Sanctions.** Provisional approval of LEA applications has been instituted as a first level sanction when LEAs have not submitted required documentation for phases of the UPIPS process. The State Director of Special Education is working with the USOE UPIPS Steering Committee and the USOE Superintendents to develop additional sanctions as needed. This procedure will be in place during the 2006-2007 school year.

XII. Record Storage Procedures

Records of all information collected during the UPIPS process are maintained by the UPIPS Team Leader and UPIPS support staff. A binder that contains all of the materials and documents from each 5 year UPIPS cycle is produced for each LEA following the development of the validation visit report. The sections included are:

Offsite data. Forms, state level data, child find documentation, evaluation tools and materials, and report to superintendent regarding offsite data.

Self Assessment Report. The LEA's self assessment report and the executive summary of the report are included.

Materials from onsite visit. Completed interview forms, summaries of orientation and exit meeting note and parent focus group notes, validation team member highlights, student record review reports, visit schedule, administrative interview, student focus group notes.

Records of non-compliance issues from previous program review compliance reports are also stored. These records as a whole provide a sequenced history of the LEA's compliance with IDEA.

Other information about the year 3-5 documentation of the submission and implementation of corrective action plans and program improvement goals is included as received. This includes evidence of when the corrective actions occurred, who was in attendance, and what the content of the actions was. After the focused verification of results of corrective actions is conducted, the results of this activity are also kept here. These are always copied to the USOE TA as well. Other documents are kept and some backed up with electronic records on the hard drives of the UPIPS Coordinator and UPIPS support staff. Binders are maintained in locked cabinets to protect the confidentiality of any identifiable information included.

CORRECTIVE ACTIONS, GOALS, AND RESULTS

Following the conclusion of a second UPIPS cycle, some data may be shredded. This data may include interviews, observations, self-assessment information, out-of-date Corrective Action Plans and Program Improvement Plans, but would not include the previous UPIPS Report.